

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of

<b>CENTURYLINK</b>	)	WC Docket No. 10-90
	)	
Notification of Modification of Connect	)	
America Phase I Round 2 Incremental Broadband	)	
Deployment Plans to Add an Additional 9,703	)	
Census Blocks	)	

To: Chief, Wireline Competition Bureau

**ATN INTERNATIONAL, INC. AND AFFILIATES’  
NOTIFICATION OF PRE-EXISTING BROADBAND SERVICES**

ATN International, Inc., on behalf of itself and its wholly-owned subsidiary, SAL Spectrum, LLC, (collectively, “ATN”), pursuant to the Commission’s Public Notice, *Wireline Competition Bureau Announces Deadline for Existing Providers to Notify Centurylink That They Serve Census Blocks That Centurylink Proposes to Serve with Connect America Phase I Incremental Support*, DA 16-1072, released September 23, 2016 (“*Deployment Notice*”), hereby notify Centurylink and the Commission that ATN already serves 33 of the 9,703 census blocks listed by Centurylink with broadband service, as defined by the Commission.<sup>1</sup>

**I. ATN Already Provides Broadband Service in These 33 Census Blocks**

ATN provides LTE wireless broadband service in those areas where it is authorized for 700 MHz operation. Initially, ATN constructed 700 MHz LTE in certain Tribal areas where it had accelerated construction deadlines associated with Tribal bidding credits, and has been offering broadband internet access service (“BIAS”) to residents of those areas for some time. ATN has now also completed most of its 700 MHz construction in its non-Tribal areas in

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<sup>1</sup> These 33 census blocks are listed in Exhibit 1 attached hereto.

advance of its non-Tribal construction deadline of December 13, 2016, including its 700 MHz LTE build-out in each of the 33 census blocks listed in Exhibit 1 hereto.<sup>2</sup> Moreover, ATN's 700 MHz LTE network covers 100% of each of these 33 census blocks, as visually depicted in Exhibit 2 attached hereto.<sup>3</sup>

Accordingly, ATN asks that Centurylink remove these 33 census blocks from its Connect America broadband deployment plans, and that if Centurylink does not do so, the Commission order that Centurylink not be entitled to USF reimbursement for any deployment in these particular census blocks, as it is unfair with ATN to have to compete against a subsidized competitor, when ATN took the risk of being the first to deploy BIAS in these areas.

Respectfully submitted,  
**ATN INTERNATIONAL, INC.**

November 7, 2016

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<sup>2</sup> ATN has notified the WTB staff orally of completion of construction of this area in New Mexico. ATN is delaying the filing of its formal construction notification for most of its 700 MHz call signs, including this one, pending WTB acceptance of ATN's "test" notification, which was for another call sign in Nevada. ATN will be filing its formal construction notification timely before the construction deadline.

<sup>3</sup> In Exhibit 2, the blue area depicts ATN's 700 MHz LTE coverage areas. The yellow area inside the blue area depicts the involved 33 Centurylink census blocks.